



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

A MISSING CHAPTER OF FRANCO-AMERICAN HISTORY¹

IF the question were asked, Who has been our greatest American diplomatist? the answer would undoubtedly be Benjamin Franklin. Measured by any standard he would be found deserving of the first place. True it is that at the very height of his usefulness in France there was a cabal formed in Congress to force his recall, which in certain periods of our national history would undoubtedly have proved successful. As it was, Franklin was allowed to remain, and the incalculable value of his services to his country has since been universally recognized. He won for the struggling colonies the aid that was needed to establish their independence; and, for this, next to Washington, Franklin deserves the gratitude of all Americans.

What is truly surprising is the estimate that was placed upon him in France for the service he rendered to France, to Europe, and to all humanity. It was simply astonishing what a flood of eulogies was poured out upon him. In some manner he came to be regarded in France as the creator of a new era in the history of the world. To read the whole anthology of praise—if anyone were disposed to collect all that was said of him—would lead to the conviction that Franklin was either a person of almost supernatural powers, or that he was a charlatan of the first magnitude who had succeeded in imposing upon the greatest minds among his contemporaries. Believing that he was neither, the problem is before us, how to account for the superlative laudation that was lavished upon him in France at the time of his death, in 1790, five years after he had returned to Philadelphia.

First of all, it is of importance to realize to what extent, and from what quarter, Franklin was made an object of encomium. In 1790 there were in France three distinct political groups: the Royalists, the Constitutionalists, and the Democrats who drew their inspiration from Rousseau. It was the Constitutionalists, without exception, who publicly mourned for Franklin. Witness the splendid oration of Mirabeau, pronounced before the National Assembly, beginning: "Franklin is dead. He has returned to the bosom of the

¹ A paper read at the meeting of the American Historical Association in Washington, December 30, 1915.

divinity, the genius who liberated America and poured upon Europe torrents of light.”²

The Assembly, which was then engaged in the act of giving to France a constitution inspired by the American example, voted to wear mourning for three days in honor of Franklin’s memory, and through its president sent condolences to the President of the United States. The Marquis de Condorcet, before the Academy of Sciences, expressed the satisfaction with which that body saw “one of its members unite the glory of liberating two worlds, of enlightening America and giving to Europe the example of liberty”.³ The Abbé Fauchet, in the name of the municipality of Paris, pronounced a discourse in which he spoke of Franklin as an “instructor” to whom it was due that France should “eternalize its gratitude”.⁴ And Vicq d’Azyr, before the Academy of Medicine, introducing his discourse with the words, “A man is dead and two worlds are in mourning”, eulogized the illustrious diplomatist as “a legislator for the nations”.⁵

Such honors had never been anywhere accorded to a diplomatic representative of any country; and, in truth, it was not to Franklin as an American minister that these honors were offered. It was to him as the creator of constitutionalism in Europe; and, in fact, there was only one group of men who accorded them, the party of professed Constitutionalists. The Royalist and Democratic groups presented an attitude of positive coolness. The Royalist journal, *L’Ami du Roi*, referring to Mirabeau’s discourse, politely observed, as became such a journal, “This eulogy was doubtless deserved, but in tracing it the orator raised his hero to such a height that he rendered it impossible for anyone to recognize in him the Franklin whom we knew.”⁶ The extreme Democratic journals were more openly critical in referring to the claims of Franklin.⁷

The reason for this indifference to Franklin’s memory is made clear by the observations of Luchet.

This republican philosopher [he says] has enlightened the protagonists of liberty. Before him the majority of publicists had reasoned like slaves overheard by their masters; or had employed their ingenuity, as Montesquieu did, to justify that which is, and gloss over our institutions

² Mirabeau, *Œuvres* (ed. Vermorel), II. 131.

³ Condorcet, *Éloge de M. Franklin*, *Œuvres* (Paris, 1804), p. 163.

⁴ Fauchet, *Éloge Civique de Benjamin Franklin* (Paris, 1790).

⁵ *Revue Retrospective* (série II.), II. 375.

⁶ *L’Ami du Roi*, 23 Juillet, 1790, even went so far as to ridicule Fauchet’s eulogy.

⁷ For example, *Révolutions de Paris*, nos. 54 and 55, where Sparta is favorably contrasted with America.

with a deceptive coating. He alone, studying the rights of mankind, sweeping aside the dust and débris, that is to say, the merely external relations of weakness and strength, of wealth and poverty, of inequality and aristocracy of every kind, has discovered the foundations of society.⁸

These tributes to Franklin assume something more than is usually ascribed to him. He is here held up, in contrast with the merely speculative philosophers, like Rousseau, as an "organizer of liberty", as an "exponent of fundamental political principles"; in short, as the "discoverer of the foundations of society"!

This is certainly a different estimate of Franklin from that which prevailed at that time in America. It is true that he had formed a plan to unite the colonies, that he had signed the Declaration of Independence, and, but a short time before, in the Constitutional Convention at Philadelphia, that he had sought in a well-remembered speech to urge harmony among the dissentients, and had prevailed upon the delegates to unite upon the Constitution as it had been framed; still, the records of that body do not show that Franklin had especially impressed his own views upon the Convention. It is not surprising, therefore, that the Royalists did not recognize in these eulogies Franklin *as they knew him*.

Was it, then, a mere effusion of the Gallic temperament that was to be discerned in these laudations? If Franklin really deserved these encomiums, these eulogists must have seen him from a point of view peculiarly their own.⁹

And this they no doubt did. When Franklin arrived in France, on December 21, 1776, there were no signs of a constitutional movement. The States General had not met for 162 years; and there was no demand for their meeting until Lafayette, in 1787, having returned from America, in reply to the Count d'Artois's question, "What, do you ask for the States General?" had answered, "Yes, Monseigneur, and something better."¹⁰ Yet all the great hierophants of political liberty, to whom the French Revolution has been so largely ascribed, had already practically exhausted their influence. Montesquieu, the soundest and most practical political thinker of his time, had been dead since 1755. Voltaire, Diderot, Mably, and Rousseau were still living; but their work of iconoclasm was complete, and they had produced no programme of construction. Of

⁸ Luchet, *Les Contemporains de 1789 et 1790* (Paris, 1790).

⁹ The society known as "Les Amis de la Constitution" also wore mourning in honor of Franklin.

¹⁰ Lafayette, *Mémoires* (Paris, 1837), II. 117. Lafayette had before this already induced the States of Auvergne to make a declaration of their rights to the king. See Lavergne, *Les Assemblées Provinciales sous Louis XVI.*, p. 200 *et seq.*

analysis and negation there had been much, but no solid ground had been laid out on which to build. Since 1762 the *Contrat Social* had powerfully appealed to the imagination of the French people; the more powerfully, perhaps, because it was in contradiction with all the facts. But, until the American Declaration of Independence had taken its speculations out of the realm of mere ideology and made some of them real by showing that there were in the world men who were prepared to shed their blood and imperil their lives in defense of it, it seemed like a mere romance.

Then Franklin came to plead the cause of the revolutionists. He came in humility, seeking for aid, and he received a ready response. Until he was officially recognized in his diplomatic quality, his mission was an appeal to the individual man. He was a noble emissary. "I was very young", wrote the Duke de Lévis, "when I saw the illustrious Franklin, but his countenance, so full of candor and nobility, and his fine white hair, will never be forgotten by me."¹¹ He appealed as no diplomatist had ever before appealed to the ordinary man. "You perceive liberty establish herself and flourish almost under your eyes", he said one day in the presence of the philosopher Condorcet. "I dare to predict that by and by you will be anxious to taste her blessings."¹²

It was not to everyone, or upon every occasion, that he could speak thus. But there were more intimate relations where he could speak even more freely, and expound his whole doctrine of constitutionalism. Only once in all his collected writings does Franklin refer to this relationship. In a letter to an old French friend and intimate associate, Monsieur Le Veillard, after his return to Philadelphia, he says, "The Lodge of the Nine Sisters have done me too much honor in proposing the prize you mention."¹³

What, then, is meant by the "Nine Sisters"?

The letter in which the proposal of a prize was communicated to Franklin by his French correspondent is not to be found in any collection; nor, so far as research has revealed, is there any other letter extant upon this subject. But collateral research has thrown much light upon the "Nine Sisters".

Arriving in Paris in December, 1776, while the American Declaration was the topic of the day, Franklin was at once the centre of public interest. More than any other diplomatic representative of whom we have knowledge he was an object of curiosity as well as respect in all grades of society, and appealed by the nature of his

¹¹ Lévis, *Souvenirs et Portraits* (Paris, 1815), p. 51.

¹² Cited by Bancroft, *History of the United States*, IX. 493.

¹³ *The Works of Franklin* (Bigelow ed.), IX. 363.

mission and the qualities of his personality to the imagination of the people.

His venerable aspect, his homely sayings, his republican simplicity of dress and manner, combined with the tact and politeness of his deportment, his anecdotes and his *bon mots* gained him among all classes admirers, disciples, and friends.

No man in Paris [says Madame Vigée Lebrun] was more *à la mode*, more sought after, than Doctor Franklin. The crowd used to run after him in the streets and in the public resorts; hats, canes, snuff-boxes, everything was *à la Franklin*.¹⁴

Turgot's Latin eulogy of the man who "had snatched the lightning from the sky and the sceptre from the hands of the tyrant" was not a stronger commendation to intellectual France than the Doctor's personal charm to the best society. After the Declaration of Independence, which, in an ambient atmosphere of suavity and dignity, he seemed to personify, he was the best asset of the colonies in their quest for French friendship.

In his eulogy upon Franklin, pronounced before the Academy of Sciences in 1793, the Marquis de Condorcet describes the state of France at the time of Franklin's arrival in Paris.

Men whom the reading of philosophic books had disposed to a secret love of liberty were impassioned for that of a foreign people, while awaiting the occasion when they could engage in recovering their own, and were seized with joy on that occasion to avow sentiments which prudence would have obliged them to guard in silence.¹⁵

But what of the "Nine Sisters"? If we may believe the Abbé Barreul, it was "the centre of a vast, concerted conspiracy between the philosophers, illuminati, and freemasons of all countries". He mentions by name thirty-two of the initiates of the "Nine Sisters" as particularly concerned in the work of the French Revolution.

The good Abbé certainly speaks with exaggeration when he characterizes this innocent secret fraternity as a "centre of a vast concerted conspiracy", extending to all countries; but he is not in error when he informs us that a great number of its members played a conspicuous part in the French Revolution.

Amiable, in his history of this society, of which he has published the records,¹⁶ tells us that, as early as 1780, Dr. Franklin was chosen the "Vénérable" of the "Nine Sisters", in which he continued until the end of his diplomatic mission in 1785. Even while he was still in Paris, in 1783, a brilliant public fête was given by this society in honor of the new republic, in which American independence was

¹⁴ Madame Vigée Lebrun, *Souvenirs* (Paris, 1835), I. 251.

¹⁵ Condorcet, *Éloge de M. Franklin*.

¹⁶ *Une Loge Maçonnique d'avant 1789* (Paris, 1897).

celebrated in prose and verse, and Franklin himself crowned with laurels.

It was during Franklin's term as presiding officer of the society that John Paul Jones was a guest of the "Nine Sisters", and one may judge of the intimacy of the fête given the intrepid sailor by the verses composed for the occasion by one of the members:

Jones, dans les combats en ressource fertile,
Agit envers ses ennemies
Comme agit envers nous une coquette habile,
On croit la prendre, et l'on est pris!

In speaking of Franklin's return to America, Amiable says:

On quitting his second fatherland to behold it no more, he left to it the seed which was soon to germinate in the ancient soil of Gaul and produce the "Declaration of the Rights of Man and the Citizen."

The form in which that seed was left is well described in the language of the same writer: "The movement of emancipation in North America was transmitted", he says, "into public acts having the character of fundamental compacts defining the principles of legislation and determining the bases of the organization of public powers." It is of this precisely that France then stood in need. "The American constitutions", Amiable concludes, "were for liberty that which a grammar is for a language, defining the parts of speech and constructing them according to the rules of syntax."

It is not credible that Franklin, as "Vénérable" of the "Nine Sisters", was engaged in any conspiracy, especially any secret plot against the king to whom he was accredited, or that he was in any respect disposed to encourage revolution against a government that had been so generous to his country. It is, however, certain that the society of the "Nine Sisters" was an esoteric school of political thought, in which Franklin, for every reason, was esteemed the master.

In reviewing the list of members we have additional ground for believing that, although some of them were finally far removed from the spirit of their "Vénérable", the doctrine expounded by him was sound, salutary, and ennobling. That it consisted largely in an examination of the foundations of government cannot be doubted. The "Nine Sisters" was the first school of constitutionalism that ever existed in Europe.

Of this statement we may be practically certain. The work was fairly under way as early as 1778. In 1783 the constitutions of the thirteen American states were publicly known in France, having been

translated into French by one of the members of the "Nine Sisters", the Duke de la Rochefoucauld d'Anville, with the permission of Vergennes; who, however, delayed his answer from March 24, when the request was presented, to June 7, when it was granted. Even so, the count first demanded the privilege of inspecting the volume containing these modest charters of liberty.¹⁷ Six hundred copies were printed, and one was presented to each of Franklin's diplomatic colleagues, accompanied by elegantly bound copies in quarto for their sovereigns. In reporting his action to the Congress, on December 25, 1783, Franklin said: "From all parts I have the satisfaction to hear, that our Constitutions in general are much admired."

But this was not the first acquaintance with these constitutions by the members of the "Nine Sisters". Many of them had been printed in French much earlier, some of them in a periodical called *Affaires des l'Angleterre et de l'Amérique*, in which Franklin is known to have been interested; and six of them had been surreptitiously printed in a separate volume at Paris as early as 1778.¹⁸

It has long been well known that Franklin, who was a printer, had a printing-press in his house at Passy, ostensibly for the printing of "trifles", or "Bagatelles", as he called them, and often "amused himself" with composing and printing. But it has only recently been brought to light by Livingston, that "he was continually buying type in considerable quantity", eight boxes at one time having come from London by way of Amsterdam in October, 1779, and there was much correspondence with Haarlem on the subject in 1780. In 1777 Franklin employed Courtney Melmoth, "a political writer", at a salary of 11,428 livres per annum; and in 1784 he is known to have employed a regular compositor in his house for at least five months.¹⁹

We have no detailed report of the proceedings and discussions in the intimate fellowship of the "Nine Sisters", but what an influence was exerted by that group of men! It is impossible to call the roll completely, but here are a few of the members' names.

Bailly, the astronomer, afterward mayor of Paris, and member of the States General. It was Bailly who presided over the Third Estate when, on June 20, 1789, excluded by the king's command from their proper meeting-place, they assembled in the famous

¹⁷ *Constitutions of the Thirteen United States of America* (Paris, 1783). The octavo edition comprised 500 copies; the quarto edition, 100 copies. A later edition of American constitutions was brought out in two volumes in 1792.

¹⁸ Livingston, *Franklin and his Press at Passy* (New York, 1914, published by the Grolier Club), p. 186.

¹⁹ *Ibid.*, p. 9.

tennis-court, organized their meeting, and with only one dissenting voice took an oath that they would not disperse until they had obtained a constitution for the French nation. It was he also, three days afterward, at the end of the royal *séance* of the States General, when the king had sent the bejewelled young courtier, Dreux Brézé, to command the Commons to disperse, who replied firmly, "Sir, the Assembly stands adjourned only by its own vote." It is not a mere flourish of rhetoric when Belloc writes: "The fall of those hundreds of hands [that voted down the motion to adjourn] marks the origin of modern Europe, its vast construction, its still imperilled experiment."²⁰ It was Bailly who, with Lafayette, appealed in vain to the soldiers to respect the person of the king, on his way to worship on Easter Sunday of 1791; and who again endeavored to protect the crowd in the so-called "Massacre" of the Champs de Mars. It is not surprising that such a moderate spirit made Bailly one of the first victims of the Revolutionary Tribunal. When this friend of Franklin was led to the guillotine, his clothing wet through with a cold rain, one of the executioners observed, "You tremble, Bailly"; "Yes", was the reply, "but it is only with the cold."

Bonneville, the translator of the works of Thomas Paine, whom Brissot de Warville describes as "a true philosopher, a true friend of the people, a true friend of liberty, who never transcended the necessary bounds".²¹ It was Bonneville who, in 1791, pressed for the right of petition and for universal suffrage, in the meantime urging the adoption of the constitution, which he and his associates "awaited with impatience".

Brissot de Warville, who, owing to his absence in England during the greater part of Franklin's residence in France after Brissot became a member of the "Nine Sisters", saw little of the "Vénérable" but nevertheless was an ardent admirer.²²

Indignant at the despotism under which France was groaning, in 1788, [he says] I made a journey in the United States, in order to ascertain the means with which to accomplish a similar revolution; or, if it was necessary to renounce the hope of it, to settle my family in America.²³

It was during this journey, that the Federal Constitution was under discussion. Its fate was still hanging in the balance. Having learned of the meeting of the States General, believing the Constitution of the United States to be a "perfect model",²⁴ and feeling the

²⁰ Belloc, *High Lights on the French Revolution* (New York, 1915), pp. 44, 48.

²¹ Brissot de Warville, *Mémoires* (Paris, 1911), I. 135.

²² He records his meeting with Franklin at the house of Marat. *Ibid.*, I. 142.

²³ *Ibid.*, II. 275.

²⁴ Ellery, *Brissot de Warville* (Boston, 1915), p. 125.

necessity of a new government for France, he hastened to return. As an authority on American affairs, of which he had written much, "his opinions were listened to with respect". He was active in urging the American rather than the English example upon France. "A declaration of rights", he contended, "is a chapter as necessary for a constitution as a foundation for a house. The constitution may change, the declaration of rights ought never to change."²⁵ After leading in the defense of France as a Minister of State during the ascendancy of the Girondists, or "Brissotins", as they were sometimes called, Brissot perished with that group on October 31, 1793.

The Marquis de Condorcet, the philosopher of the Revolution, author of the *Influence of the American Revolution upon Europe*,²⁶ and many other writings relating to America, all of them surcharged with his own philosophic speculations, but full of ardent enthusiasm for the progress of the human race. A fearless constitutionalist, and an active participant in the constitutional movement, he, too, like Brissot, perished in the fall of the Girondists.

Danton, "the giant of the Revolution", the man of dramatic action; too virile, perhaps; the most thoroughly French of all the great leaders; an organizer, an original thinker, and a jurist; he also was of the company. After futile efforts to reconcile himself to the party of moderation, although he declared "a nation may *save* itself, but must not *avenge* itself", yet hating the bloodthirstiness of Robespierre and St. Just, that hatred turned against himself and brought him to the scaffold.

Camille Desmoulins, the journalist *par excellence* of the Revolution, a worshipper of the ancient classics, and destined to be *l'enfant terrible* of the constitutionalists, drawing his inspiration from the pure democracies of Greece, and believing that the American states were a revival of them. He it was who incited the populace to storm the Bastille, the keys of which were sent by Lafayette to General Washington. Finally condemned by the Revolutionary Tribunal, he was executed at the same time with Danton.

Hilliard d'Auberteuil, whose works on America, which began to be published in 1782 under the influence of Franklin and were continued with the counsel of Jefferson, attracted wide attention to the institutions of America.²⁷

²⁵ *Ibid.*, p. 126.

²⁶ Condorcet, *L'Influence de la Révolution d'Amérique sur l'Europe* (Paris, 1786).

²⁷ Hilliard's most important work was entitled *Essais Historiques et Politiques sur les Anglo-Américains et sur la Révolution de l'Amérique* (Paris, 1782). For his relations with Jefferson, see *The Writings of Thomas Jefferson* (Washington ed.), II, 103.

Pétion, called the "virtuous Pétion", a member of the National Assembly, who, with Barnave and Latour-Maubourg, brought Louis XVI. back to Versailles after his flight with the queen to Varennes, and successor to Bailly as mayor of Paris. It was Pétion who, with Barnave, Lafayette, and Duport, the friend of Jefferson, advocated the adoption of the jury system for both civil and criminal cases; and who pleaded in the Constituent Assembly for the freedom of the press in imitation of the action of America.²⁸ Condemned to death with the Girondists, he was saved from execution by flight and concealment.

Rabaut Saint-Étienne, member of the Constituent Assembly, of which he became the historian,²⁹ a conservative converted to republicanism by the perfidy of the king, of whom he said from the tribune of the Constituent, "*This king has delivered us from all kings.*"

Sieyès, a cold, logical personality, author of the celebrated pamphlet, "*Qu'est ce que le Tiers État?*" in which he made the famous reply, "It has been nothing; it aspires to be something; it is, in truth, *everything.*" It was he who cried out amidst the passionate ebullitions of the Assembly, "You wish to be free, but you do not know how to be just." Carried away with his own fine-spun theories, from an ardent constitutionalist Sieyès degenerated into a professional fabricator of paper systems, surviving the destruction of all his own work, after serving as the tool of Bonaparte.

But it is needless to extend the catalogue further. It may be said with confidence that it was the initiates of the "Nine Sisters", together with the officers who had returned from service in America—of whom Lafayette was the chief—and the flood of writers who were inspired by the American example, who gave both shape and substance to the early period of the French Revolution.³⁰

²⁸ Arguing for the freedom of the press, Pétion said: "Did you not see, when the new federal system of the United States was under hot discussion, a strong party pronounce itself fiercely against the Confederation, speak loudly for the disunion of the states, publish the most vehement pamphlets and scatter their views broadcast in all the gazettes? . . . The people read everything, heard everything, examined everything. No troubles followed. . . . Such will ever be the ascendancy of reason over a free people." Pétion, *Œuvres* (Paris, 1793), II. 365.

²⁹ See his *Précis Historique de la Révolution* (Paris, 1793). Rabaut was a personal friend of Jefferson, and a frequenter of his house.

³⁰ Other writings regarding America published just before the French Revolution were: Bossu, *Nouveaux Voyages* (Amsterdam and Paris, 1778); Bourgeois, *Voyages Intéressants* (Paris, 1788); Brissot et Glavière, *France et les États-Unis* (Paris, 1787); Quesnay de Beaurepaire, *Mémoires* (Paris, 1788); Crèveœur, *Lettres d'un Cultivateur Américain* (Paris, 1784); Mazzei, *Recherches Historiques et Politiques sur les États-Unis* (Paris, 1788); Mandrillon, *Le Voyageur Américain* (Amsterdam, 1782); the same, *Le Spectateur Américain* (Paris, 1784); Abbé Robin, *Nouveau Voyage dans l'Amérique Septentrionale* (Paris, 1782); Soulés, *Histoire des Troubles de l'Angleterre* (Paris, 1787).

Even if the American colonies had never existed, there would, no doubt, have been a general revolt against absolute royal authority in France; but it would certainly never have occurred as it did, and it would not have been a constitutional movement in the sense it was. The American influence ended precisely where the absolutism of the Revolutionary government began. With the rising and domination of the populace of Paris it met with stubborn contradiction.³¹ The name "Constitution" was retained, but it had lost its true meaning, and had become a designation for any artificial frame of government, regardless of its qualities.

The two chief characteristics of the American constitutions—limitation of the powers of legislation and the final authority of the judiciary in declaring the law³²—were wholly wanting in the six French constitutions that followed in swift succession during the Revolution, and made the nation "through many decades the plaything of every current that swept the political sea". The American idea that it is the purpose of a constitution to guarantee individual rights and liberties against the encroachments even of popular government, was abandoned. In France it had been accepted as a restraint upon the acts and power of the sovereign, so long as the sovereign was a king; but when the sovereign was the people, restraints were thought to be quite unnecessary. Government, therefore, remained as absolute as before; and it soon became evident that the Revolution had produced merely a change of masters.

DAVID JAYNE HILL.

³¹ On the difference between the principles of the American and the French Revolutions, see the present writer's *The People's Government*, pp. 106, 114, 235, and 242.

³² In the French Constitution of 1791, the Declaration of Rights is printed as a *preliminary* to the constitution proper. Violations of its specifications were not subject to judicial control, and the prejudice against judges left the legislature omnipotent. There is in France a vigorous contemporary movement toward the American system. See the article by James W. Garner, in the *American Political Science Review*, vol. IX., no. 4, particularly pp. 658, 665.